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13 UNITED STATES DISTRICT COURT
14 CENTRAL DISTRICT OF CALIFORNIA
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16 KRISTA PERRY, an individual;
17 LARISSA MARTINEZ, an
individual; and JAY BARON, an
individual,
18 Plaintiffs,

19 v.

20 SHEIN DISTRIBUTION
21 CORPORATION, a Delaware
corporation; ROADGET BUSINESS
22 PTE. LTD; ZOETOP BUSINESS
COMPANY, LIMITED; and DOES
1-10 inclusive.

23 Defendants.
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CASE NO. 2:23-cv-05551
**DECLARATION OF ALI RABBANI
IN SUPPORT OF JOINT
STIPULATION REGARDING
FILING OF PLAINTIFFS' FIRST
AMENDED COMPLAINT AND
DEFENDANTS' DEADLINE TO
RESPOND**

Hon. Mark C. Scarsi

DECLARATION OF ALI RABBANI

I, Ali Rabbani, declare as follows:

1. I am an attorney with Paul Hastings LLP, counsel for Defendants Shein Distribution Corporation, Roadget Business Pte. Ltd., and Zoetop Business Company, Limited (collectively, “Defendants”). This declaration is submitted in support of the parties’ Joint Stipulation and [Proposed] Order Regarding Filing Of Plaintiffs’ First Amended Complaint and Defendants’ Deadline to Respond. I have personal knowledge of the facts set forth herein and, if called as a witness, I could and would testify competently to them.

2. On July 11, 2023, Plaintiffs filed their initial Complaint against Defendants in this action.

3. On July 28, 2023, Defendants agreed to waive service of a summons in this action, and, as a result, I understand that Defendants' current deadline to respond to the Complaint is September 26, 2023.

4. On September 12, 2023, counsel for Plaintiffs and Defendants, respectively, met and conferred pursuant to Local Rule 7-3 to discuss Defendants' contemplated motion to dismiss Plaintiffs' RICO claim pursuant to Fed. R. Civ. P. 12(b)(6) and motion to strike portions of the Complaint pursuant to Fed. R. Civ. P. 12(f).

5. After discussing the grounds for Defendants' contemplated motions, Plaintiffs stated their intent to amend their Complaint to, among other things, add further allegations regarding their RICO claim and additional plaintiffs.

6. In order to conserve the Court's and the Parties' resources, the parties further met and conferred and stipulated, subject to Court approval, to defer Defendants' deadline to respond to the initial Complaint until after Plaintiffs have filed their First Amended Complaint and to a briefing schedule governing any motion(s) filed by Defendants.

7. The parties have not sought any other extensions of time in this action.

8. The parties do not seek to reset these dates for the purpose of delay, and the proposed modification will not affect any additional pre-trial and trial dates, which have not yet been set by the Court.

I declare under penalty of perjury under the laws of the United States of America that the foregoing facts are true and correct.

Executed this 19th day of September at Newport Beach, California.

/s/ Ali Rabbani
Ali Rabbani